

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED

2019 MAY -7 P 3:52

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

DEPT. CLERK

UNITED STATES OF AMERICA

v.

SHAWN BARAHAN FITTS,  
BRANDON CLARON THOMAS,  
JASON ERIC STANSBERRY,  
CHRISTOPHER MICHAEL WYRICK, and  
ROCKELE BRYANT.

NO. 3:19-CR-75  
JUDGES

INDICTMENT

COUNT ONE

The Grand Jury charges that from in or about July 2018, up to and including on or about May 1, 2019, in the Eastern District of Tennessee and elsewhere, the defendants, SHAWN BARAHAN FITTS, BRANDON CLARON THOMAS, JASON ERIC STANSBERRY, CHRISTOPHER MICHAEL WYRICK, and ROCKELE BRYANT, did combine, conspire, confederate, and agree with one another and others known and unknown to the Grand Jury to knowingly, intentionally and without authority, to distribute and possess with intent to distribute five (5) kilograms or more of cocaine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

The Grand Jury further charges that from in or about July 2018, up to and including on or about May 1, 2019, in the Eastern District of Tennessee and elsewhere, the defendants, SHAWN BARAHAN FITTS, BRANDON CLARON THOMAS, JASON ERIC STANSBERRY, and CHRISTOPHER MICHAEL WYRICK, did knowingly, intentionally, and without authority

combine, conspire, confederate, and agree with one another and others known and unknown to the Grand Jury to commit certain offenses against the United States in violation of Title 18, United States Code, Section 1956 as follows:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute five (5) kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A), with the intent to promote the carrying on of a specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute five (5) kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A), and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute five (5) kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, that is conspiracy to distribute and possess with the intent to distribute five (5) kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846,

841(a)(1), and 841(b)(1)(A), and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

### **DRUG TRAFFICKING FORFEITURE ALLEGATIONS**

The allegations contained in Count One are incorporated herein by reference for the purpose of alleging forfeiture. Upon conviction of an offense in violation of 21 U.S.C. § 841, the defendants SHAWN BARAHAN FITTS, BRANDON CLARON THOMAS, JASON ERIC STANSBERRY, CHRISTOPHER MICHAEL WYRICK, and ROCKELE BRYANT, pursuant to 21 U.S.C. § 853, shall forfeit to the United States any and all property used, and intended to be used, to commit, and to facilitate the commission of a violation of 21 U.S.C. § 841, and any and all property constituting and derived from any proceeds obtained, directly and indirectly, as a result of a violation of 21 U.S.C. § 841, including, but not limited to the following property:

#### **Vehicles**

- a. 2004 Lexus RX330, VIN No. 2T2GA31U94C017255, bearing Tennessee license plate number 6N31S6, registered to Khadashia J. Wyrick, 410 Forestal Dr., Knoxville, Tennessee 37918;
- b. 2015 Dodge Charger, VIN No. 2C3CDXCT2FH901637, bearing Tennessee license plate number 9P31J5, registered to Krista N. Wyrick, 410 Forestal Dr., Knoxville, Tennessee 37918; and
- c. 2019 Nissan Maxima, VIN No. 1N4AA6AV5KC362279, bearing Tennessee license plate number BPT176, registered to Richard Jentzsch, P.O. Box 265, Norris, Tennessee.

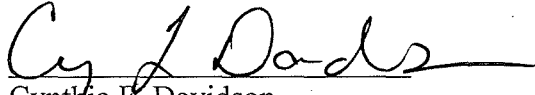
If, as the result of any act or omission of the defendant SHAWN BARAHAN FITTS, BRANDON CLARON THOMAS, JASON ERIC STANSBERRY, CHRISTOPHER MICHAEL WYRICK, and ROCKELE BRYANT, any of the property described above, (1) cannot be located

upon the exercise of due diligence; (2) has been transferred or sold to or deposited with a third party; (3) has been placed beyond the jurisdiction of the Court; (4) has been substantially diminished in value; or (5) has been commingled with other property which cannot be divided without difficulty, the defendants shall forfeit any other property of the defendants up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL:

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY  
UNITED STATES ATTORNEY

  
Cynthia F. Davidson  
Assistant United States Attorney